



Fish & Richardson P.C.
1180 Peachtree Street, NE
21st Floor
Atlanta, GA 30309
404 892 5005 main
404 892 5002 fax

VIA ECF

September 22, 2022

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12D
New York, NY 10007

Aamir A. Kazi
Principal
kazi@fr.com
404 724 2811 direct

Re: *W.P.V., on his own behalf and on behalf of his minor child, W.P.O. v. U.S., et al.*
Civ. Action No. 1:21civ4436

Dear Judge Cronan:

The parties provide the below update regarding the above-captioned case.

Plaintiffs and Cayuga Centers have reached a settlement agreement in principle and are continuing to engage in negotiations to finalize the terms of the agreement. The parties request an additional month to finalize the terms and propose that the parties submit a joint letter regarding the status of settlement negotiations on Monday, October 24, 2022 if no agreement has been reached.

We thank the Court for its consideration of this matter.

Respectfully submitted,



Honorable John P. Cronan
September 22, 2022
Page 2

Dated: September 22, 2022

/s/ Aamir A. Kazi

By: Aamir A. Kazi (Admitted *pro hac vice*)
GA Bar No. 104235
Karan Jhurani (Admitted *pro hac vice*)
GA Bar No. 290326
Fish & Richardson P.C.
1180 Peachtree Street NE, 21st Floor
Atlanta, GA 30309
Telephone: (404) 892-5005
Facsimile: (404) 892-5002
E-mail: kazi@fr.com
jhurani@fr.com

Caitlin M. Dean (Admitted *pro hac vice*)
TX Bar No. 24109797
Fish & Richardson P.C.
7 Times Square, 20th Floor
New York, NY 10036
Telephone: (212) 765-5070
Facsimile: (212) 258-2291
E-mail: cdean@fr.com

Attorneys for Plaintiffs

/s/ Rachael Marvin (with permission)

By: Robert Modica
Rachael Marvin
Coffey Modica O'Meara Capwoski
200 E. Post Rd. Suite 210
White Plains, NY 10601
Telephone: 212-827-4501
Facsimile: 248-331-6101
E-mail: rmarvin@cmocllp.com

Attorneys for Defendant

Cayuga Home for Children, Inc. d/b/a
Cayuga Centers